

Exhibit 3

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
Case No. 7:20-cv-248-FL**

MARY TOWANDA WEBSTER-REED,
individually and as representative of the
Estate of Brandon Lovell Webster, et al.

Plaintiffs,

v.

SCOTT ANTHONY COLLINS, *in his
individual capacity,*

Defendant.

DECLARATION OF NARENDRA K. GHOSH

Narendra K. Ghosh, under penalty of perjury, deposes and says:

1. I am an attorney practicing law in North Carolina.
2. I received my undergraduate degree from Harvard College in 1998, where I graduated *summa cum laude*. I received my law degree from the New York University School of Law in 2005, where I graduated *magna cum laude*. Before joining Patterson Harkavy, I served as a law clerk to Judge A. Wallace Tashina on the Ninth Circuit Court of Appeals from 2005 to 2006, and as a law clerk to Judge Emmet Sullivan on the District Court for the District of Columbia from 2006 to 2007.
3. I have practiced as an attorney at Patterson Harkavy LLP since 2007 and have been a partner since 2011. I am admitted to practice in each of the three federal district courts in North Carolina, the Fourth Circuit Court of Appeals, and the United States Supreme Court.
4. My practice focuses on civil rights and constitutional law, as well as employment, labor, and appellate litigation. I practice in state and federal court and regularly litigate cases in the Eastern District of North Carolina. I regularly attend and present at CLE's on topics

including constitutional law. I am active in the North Carolina Advocates for Justice, including in the civil rights section.

5. I regularly represent plaintiffs in cases brought under 42 U.S.C. § 1983 based on law enforcement officers' violations of the Constitution, including cases involving traffic stops, police shootings, and other uses of excessive force. *See, e.g., Centeno v. Tripp*, No. 4:20-cv-33 (E.D.N.C.); *Howard v. City of Durham*, No. 1:17-cv-477 (M.D.N.C.); *Betton v. Knowles*, No. 4:15-cv-04638 (D.S.C.); *Frails v. Riley*, No. 5:15-cv-665-FL (E.D.N.C.); *Dail v. City of Goldsboro*, 5:10-cv-451 (E.D.N.C.). I have litigated a number of appeals resulting in published opinions regarding law enforcement officers' Fourth Amendment obligations. *See, e.g., Betton v. Belue*, 942 F.3d 184 (4th Cir. 2019); *State v. Nicholson*, 371 N.C. 284, 813 S.E.2d 840 (2018); *State v. Leak*, 241 N.C. App. 359, 773 S.E.2d 340 (2015).

6. I represent the Plaintiffs in this case with my partners Brad Bannon and Paul Smith, and attorney Ira Braswell of the Braswell Law Firm. I began work on the case in March 2021. My partners and I agreed to represent the Plaintiffs in the present litigation in May 2021.

7. Our representation agreement with the Plaintiffs included a contingent attorney's fee of 40% of any recovery. I believe that a 40% contingency fee is reasonable in this case. Patterson Harkavy LLP typically charges a 40% contingency fee in civil rights cases settled after or near the close of discovery. A 40% contingent attorney's fee is customary in civil rights cases given their factual and legal complexity, and given the risks posed by the various immunities available to public officer defendants under state and federal law.

8. I contemporaneously kept track of my hours in order to ensure they were recoverable under 42 U.S.C. § 1988. A detailed accounting of my hours through February 21, 2023, is attached as Exhibit A. I helped evaluate the merits of the case before accepting

representation, oversaw the litigation strategy for the case, was involved in the discovery process, worked on amending the pleadings, had responsibility for identifying and assisting expert witnesses, prepared for and attended depositions, prepared for and attended mediations, and had primary responsibility for finalizing the settlement agreement with the appointed guardians ad litem, structured annuity expert, and trusts attorney.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

This the 22nd day of March, 2023.



Narendra K. Ghosh

Exhibit A

Time for Narendra Ghosh		
Date	Description	Time
03/12/2021	Review filings to date and Brad's summary; email with team re same.	1.00
03/25/2021	Confer with co-counsel re evaluation of case law.	1.20
03/26/2021	Call with co-counsel re case overview, merits; confer with Paul Smith re same; email co-counsel re same.	1.10
03/30/2021	Email co-counsel re case evaluation.	0.30
04/01/2021	Call with co-counsel re case evaluation; confer with Paul Smith re same; review co-counsel notes on issues.	1.70
04/02/2021	Confer and email with co-counsel re decision to take case.	0.50
05/10/2021	Confer and email with co-counsel re mediators.	0.80
05/20/2021	Confer and email with Paul Smith re initial client meeting.	0.60
05/21/2021	Call with Paul and Brad re client meeting; email them re same.	0.60
05/26/2021	Draft and file notice of appearance; review scheduling order; review discovery requests.	0.60
05/27/2021	Review and revise discovery requests; confer with Paul Smith re initial disclosures, next steps.	0.50
05/28/2021	Email with co-counsel re discovery requests.	0.40
06/01/2021	Call with Paul Smith re IDs; review IDs.	0.50
06/04/2021	Confer with Kim Stein, Paul Smith re subpoenas.	0.10
06/08/2021	Revise draft protective order.	0.40
06/09/2021	Confer with Paul Smith re experts, Drago.	0.60
06/11/2021	Confer with Paul Smith re subpoenas. Drago.	0.30
06/15/2021	Confer with Paul Smith re video expert; Call with Brad Bannon re client meeting.	0.20
06/16/2021	Update schedule.	0.20
06/17/2021	Team zoom re next steps; research protective order issue; email with co-counsel re protective order.	0.70
06/18/2021	Call with Brad Bannon re witness meeting.	0.40
06/30/2021	Email with co-counsel re protective order.	0.10
07/02/2021	Revise protective order motion.	0.20
07/06/2021	Confer with Paul Smith re subpoenas and protective order.	0.20
07/08/2021	Review order.	0.10
07/09/2021	Confer with Paul Smith re subpoenas.	0.20
07/12/2021	Confer with Paul Smith re video and video expert; email IDS re experts.	0.40
07/13/2021	Email with Paul Smith re experts.	0.20
07/14/2021	Revise extension motion and email with Paul Smith re same.	0.20
07/16/2021	Review order; update schedule; confer with Paul Smith re next steps.	0.20
07/19/2021	Confer with Paul Smith re experts, FB discovery.	0.30
07/22/2021	Confer with Paul Smith re expert JW; email with Manette.	0.40

07/28/2021	Confer with Paul Smith re discovery extension, expert options.	0.20
07/30/2021	Confer with Paul Smith re gun expert.	0.30
08/17/2021	Call with Paul Smith re new expert, discovery issues, next steps.	0.50
08/18/2021	Call with team re update, subpoenas, experts, witnesses, next steps.	0.40
08/20/2021	Email with Paul Smith re protective order agreement; Call with Paul Smith re discovery; call with expert Bill Williams re review, next steps.	1.10
08/23/2021	Email Kim Stein re discovery responses; review Bill Williams expert report; email and call with Paul Smith re extension; Call with Brad Bannon re store.	0.70
08/25/2021	Email with co-counsel re extension motion.	0.40
08/26/2021	Email with Paul Smith re protective order.	0.10
08/27/2021	Review order; update schedule; call with Trisha Pande re discovery.	0.20
08/30/2021	Confer with Paul Smith re expert visit.	0.10
09/08/2021	Confer with Paul Smith re tasks, Call with Brad Bannon re discovery review.	0.10
09/14/2021	Confer with Brad Bannon and Paul Smith re amended complaint, discovery f/u, deposition plan; email with co-counsel re mtgs; research wrongful death and NIED issues.	3.20
09/15/2021	Review and revise amended complaint; research re claims.	2.70
09/16/2021	TC with Paul Smith re complaint, next steps; confer with team re claim research, amended complaint, discovery letter; email with Ryan Smithwick; review discovery letter.	1.30
09/17/2021	Conf call with Ryan Smithwick; research estate issue; confer with Paul Smith re claims, dsic; confer with call with Ira re am comp.	1.80
09/19/2021	Research wrongful death claims; revise amended complaint; email co-counsel re same.	1.50
09/20/2021	Draft amended complaint; client meeting; email with co-counsel re complaint, mtg, discovery motion; confer with co-counsel re complaint.	3.70
09/21/2021	Email with co-counsel re amended complaint, motion to amend, email to SHP; revise extension motion.	0.60
09/22/2021	Email with co-counsel re next steps, deposition.	0.50
09/23/2021	Email with co-counsel re witness, subpoenas.	0.30
09/24/2021	Email with co-counsel re subpoenas.	0.10
09/29/2021	Email with co-counsel re SHP subp; review email from Brad Bannon re video.	0.20
09/30/2021	Email with co-counsel re deposition plan.	0.10
10/01/2021	Email with co-counsel re deposition date; confer with Paul Smith and Brad Bannon re deposition plan.	0.80
10/04/2021	Call with Brad Bannon re expert docs, deposition prep plan.	0.20
10/05/2021	Email with Leto Copeley re damages expert; email Ballew re same; review recs re medical treatment; email with Kim and co-counsel re medical records.	0.90

10/06/2021	Call with Leto re damages; confer with Paul Smith re expert witnesses; Call with Brad Bannon re client mtgs; email with co-counsel re docs to experts.	1.40
10/07/2021	Review medical records; confer with Paul Smith re expert deadline, new discovery process; call expert Cooper.	0.60
10/11/2021	Call Ballew; confer with Paul Smith re call, email to expert, expert analysis and cost; motion for expert extension.	0.40
10/12/2021	Email with co-counsel re extension.	0.20
10/13/2021	Edit extension motion; confer with co-counsel re deposition plan; call and email with co-counsel re discovery f/u.	1.70
10/15/2021	Confer with Paul Smith re discovery update; extension motion and clerk; Call with Brad Bannon re expert.	0.30
10/18/2021	Review new discovery production; email with co-counsel re disc, exp; update schedule; confer with Paul Smith and Brad Bannon re discovery and deposition sched.	1.00
10/19/2021	Email co-counsel re deposition date.	0.10
10/20/2021	Review email re client call.	0.10
10/28/2021	Email with co-counsel re SHP responses.	0.10
11/01/2021	Email with co-counsel re subpoena to mart.	0.30
11/02/2021	Email with co-counsel re damages witnesses, witness in prison; confer with co-counsel re expert Bill Williams; call with Ballew re damages experts.	1.00
11/03/2021	Call with Paul and Brad re expert problems, new experts.	0.60
11/04/2021	Email with potential expert Arden; confer with with Paul Smith re reconstruction plans; confer with call with Moore re experts; call with co-counsel re new experts.	1.90
11/05/2021	Confer with Paul Smith re experts; call with expert Arden; confer with with Paul Smith and Brad Bannon re Arden, Miller; email Arden re retention.	1.20
11/08/2021	Confer with Paul Smith re ballistics expert; email with Arden, co-counsel re engagement letter, confidentiality form.	0.60
11/09/2021	Call with Paul Smith re expert call, docs to expert Arden, plan for tonight.	0.20
11/10/2021	Analyze SHP insurance policy; call with Paul Smith re site visit, tasks to do; email with expert Arden re check; email expert Arden re materials; email expert Huske re check; send letter to Hueske; send letter to Arden.	1.90
11/15/2021	Email Kim Stein re records request.	0.10
11/17/2021	Review Bill Williams materials; call with Paul Smith re same.	0.20
11/18/2021	Email with Kim Stein, Paul Smith re getting docs; call with Paul Smith re docs to experts, calls with experts, deposition plans.	0.40
11/19/2021	Confer with Paul Smith re docs to experts; email with expert Arden re call.	0.20

11/22/2021	Call with Paul Smith re expert calls and plans, discovery f/u, deposition schedule; email with Brad Bannon re schedule; call with expert Arden re record review.	1.00
11/23/2021	Zoom conference with experts Bill Williams and Ed Hueske; conf call with Paul Smith and expert Drago.	1.80
12/01/2021	Review draft reports from Arden, Hueske, Williams; confer with Paul Smith re materials to Drago; call with Brad Bannon and Paul Smith re supp discls.	1.60
12/02/2021	Review Drago report; confer with Paul Smith and Brad Bannon re next steps with experts.	0.50
12/02/2021	Confer with Paul Smith and Brad Bannon re hospital claims.	0.80
12/03/2021	Conf with Paul Smith re call with expert Bill Williams; research hospital claim issues.	0.60
12/06/2021	Confer with Paul Smith re expert reports; review edits to Ed Hueske report; review and revise Arden report; call with Brad Bannon re Ed Hueske report.	1.00
12/07/2021	Confer with Paul Smith re Drago report; confer with Paul Smith re Bill Williams CV; review draft Bill Williams report; call with expert Ed Hueske and Paul Smith.	1.30
12/08/2021	Review and edit Drago report; confer with Paul Smith re extension motion; review and edit Hueske report; revise extension motion.	2.30
12/09/2021	Call with Brad Bannon and Paul Smith re hospital claims.	0.70
12/09/2021	Review and comment on Drago report; Call with Paul Smith and Brad Bannon re Drago report.	0.30
12/10/2021	Email with co-counsel re Drago rep, mats to Drago; confer with Paul Smith re Bill Williams rep, extension motion, drafting discovery.	0.50
12/10/2021	Email with co-counsel re hospital claims.	0.30
12/13/2021	Call with Paul Smith re Ed Hueske report, Bill Williams report.	0.50
12/15/2021	Confer with Brad Bannon and Paul Smith re Bill Williams report.	0.60
12/16/2021	Email co-counsel re depositions; email with co-counsel re Ed Hueske rep.	0.20
12/17/2021	Confer with Paul Smith and Brad Bannon re Ed Hueske and Bill Williams reports.	0.30
12/30/2021	Confer and email with Paul Smith re Bill Williams bill.	0.20
01/05/2022	Conf with Paul Smith and Brad Bannon re new subp, discovery f/u, Collins deposition, Bill Williams report, additional depositions, other witness declarations; confer with Paul Smith re mediation.	1.40
01/05/2022	Confer with Paul Smith and review docs re IC claim.	0.20
01/06/2022	Email and confer with Brad Bannon re deposition schedule; review subpoena to SHP.	0.30
01/07/2022	Email with co-counsel re zoom meeting.	0.20
01/10/2022	Zoom with team regarding IC claims, conflict issues, next steps; send payment to expert Arden; email with Arden re bill.	1.30
01/12/2022	Confer with Brad Bannon re deponent choices; email with Paul Smith and Brad Bannon re same.	0.30

01/12/2022	Call with Paul Smith re IC issue.	0.30
01/13/2022	Call with Paul Smith re witness declarations, supp disclosures, focus group; review and revise draft RFAs; email with co-counsel re same.	0.80
01/14/2022	Confer with Brad Bannon re mediation exam discovery issues; review email re medical discovery production; email with co-counsel re mediation date.	0.60
01/18/2022	Confer with Paul Smith re supp init disclosures; Call with Brad Bannon re deposition schedule; confer with Paul Smith and Brad Bannon re deposition sched choices, docs for supp discls.	0.90
01/19/2022	Review supp disclosures; confer with with Paul Smith re same.	0.30
01/21/2022	Email with co-counsel re RFAs.	0.10
01/26/2022	Review and revise witness declarations; email with co-counsel re same; up schedule; call with Paul re new RFA; email with co-counsel re same.	0.60
01/27/2022	Email with mediation re date; confer with Paul Smith re contacting witnesses, calling opposing counsel, whether to do additional depositions.	0.40
01/31/2022	Call with Brad Bannon re Collins deposition plan.	0.10
02/03/2022	Review extension motion; email co-counsel re State's undesignated experts; email with co-counsel re deposition exhibits.	0.30
02/04/2022	Call with Brad Bannon re deposition plan; review Collins deposition outline and all the exhibits; call with Brad Bannon re outline and exhibits.	3.80
02/05/2022	Email with Brad Bannon re deposition exhibits.	0.30
02/06/2022	Confer with with Brad Bannon re deposition exhibits.	0.20
02/07/2022	Confer with with Brad Bannon and Kim Stein re deposition mechanics, videos; Collins deposition part ; confer with Brad Bannon and Paul Smith re rescheduling depo; email with Brad Bannon re exhibits.	4.60
02/08/2022	Email with Brad Bannon re deposition follow up questions; confer with with Brad Bannon re opposing counsel and deposition exhibits.	0.20
02/09/2022	Review Whaley outline; email with Brad Bannon re same.	0.50
02/10/2022	Review Whaley deposition outline; Collins deposition part II; confer with Paul Smith and Brad Bannon during depo; confer after deposition re testimony.	5.30
02/11/2022	Call with Brad Bannon re deposition exhibits; confer with Brad Bannon and email with opposing counsel and CR re deposition logistics, time; confer during deposition breaks re testimony; confer afterwards re next depositions.	1.50
02/14/2022	Review King deposition outline; confer with Brad Bannon and Paul Smith re today's deposition.	0.30
02/15/2022	Review Sanders outline; review Ward outline; Sanders deposition; Ward deposition; confer with Brad Bannon during and after depositions.	5.60
02/16/2022	Conf call with Brad Bannon and Paul Smith re IC claim.	0.20

02/16/2022	Email with Paul Smith re extension motion; conf call with Brad Bannon and Paul Smith re remaining discovery, other witnesses, traffic data, prep for mediation.	1.90
02/17/2022	Confer with Brad Bannon and Paul Smith re call with clients; call with Burton Craige re update, mediation.	0.40
02/18/2022	Confer with Paul Smith re Smithwick and mediation.	0.10
02/21/2022	Email with co-counsel re mediation prep, ins issue.	0.20
02/22/2022	Email with co-counsel re call with Wanda.	0.10
02/23/2022	Confer with co-counsel re Wanda mtg, next steps; confer with Paul Smith re insurance issue; email with co-counsel re email to opposing counsel.	0.60
02/24/2022	Confer with Paul Smith re letter to mediator.	0.30
02/25/2022	Prep for Wanda mtg, video; confer with Brad Bannon re same; review and revise mediator letter; confer with Brad Bannon re re Wanda, mediation pres, next steps.	1.90
02/28/2022	Review deposition outline; email with co-counsel re mtg; confer with Paul Smith and Brad Bannon re convo with opposing counsel; revise letter to mediator; team confer with call re nego strategy.	3.20
03/01/2022	Review and edit mediator letter; email with co-counsel re pre-mediation meetings, letter to opposing counsel.	1.40
03/02/2022	Email with co-counsel re client meeting; calls with Brad Bannon and TP re verdict research; zoom with clients re mediation; zoom with co-counsel re mediation pres; draft email re verdicts.	2.70
03/03/2022	Email with co-counsel re mediation pres; review and revise mediation pres; call with mediator and assistant re opposing counsel; calls with co-counsel re email from opposing counsel.	4.20
03/04/2022	Prep for mediation; mediation; call with mediator; call with co-counsel re mediator call, next steps.	3.80
03/07/2022	Confer with co-counsel re email to opposing counsel.	0.30
03/09/2022	Email with co-counsel re mediation.	0.30
03/15/2022	Conf with Paul Smith re Hewitt declaration; review decl.	0.40
03/16/2022	Review declaration and email co-counsel.	0.10
03/17/2022	Conf with Paul Smith and Brad Bannon re f/u with opposing counsel.	0.60
03/22/2022	Email co-counsel re letter to mediator.	0.10
03/23/2022	Review mediator letter.	0.10
03/30/2022	Email with co-counsel re mediation.	0.30
03/31/2022	Calls and emails with co-counsel re mediation, settlement.	1.00
04/01/2022	Call with Paul Smith re mediation, settlement, next steps; review mediation agreement; confer with Brad Bannon re mediation.	1.00
04/04/2022	Email with co-counsel re call; call with Burton Craige and Paul Smith re settlement issues.	0.40
04/06/2022	Confer with Paul Smith re call; call with and email Ryan Smithwick.	0.90
04/07/2022	Call with Leto re settlement issues; confer with Paul re same.	0.70
04/08/2022	Call with Burton and Paul Smith re settlement issues.	0.70

04/12/2022	Email Ryan Smithwick re scheduling call; call with Ryan Smithwick re GALs; email Burton Craige re update.	0.80
04/13/2022	Email with co-counsel re meeting.	0.10
04/14/2022	Email with GALs re mtg; review order.	0.20
04/18/2022	Conf call with GALs; conf with Paul Smith re next steps.	0.90
04/19/2022	Confer with Paul Smith re meetings with GALs.	0.20
04/21/2022	Call with Burton Craige and Paul Smith re fees issue; research approval issue.	1.10
04/27/2022	Meetings with Kristy, Whitney, and GALs in Shalotte.	10.50
05/02/2022	Call with Brad Bannon re meetings with GALs.	0.30
05/03/2022	Research re GAL motions, estate issues; calls with Burton Craige and Paul Smith re same; email GAL's re motion.	3.60
05/04/2022	Research estate issue; confer with Brad Bannon re issue; review docs from example case.	0.90
05/05/2022	Call with Burton Craige re estate issue, complications; review criminal history; call with Brad Bannon re history, criminal and estate issues; call with and email Ryan Smithwick re Bill Williams civil records; email co-counsel re same.	1.70
05/06/2022	Review court docs for Kristy; email with co-counsel re same; email with Ryan Smithwick re same.	0.70
05/09/2022	Conf with Paul Smith re next steps; draft motion re GAL appointments; email with Ryan Smithwick re file, next steps; call with opposing counsel re settlement steps, GALs.	2.30
05/10/2022	Draft GAL motion; confer with Paul Smith re motion; email same to co-counsel.	1.10
05/11/2022	Email with GAL's re motion, next steps; call with Ryan Smithwick re next steps; email Ryan Smithwick re estate issue; call with clients and Brad Bannon and Paul Smith re update, estate issues, next steps.	1.40
05/12/2022	Call with and email Rick Parrotte re estate issues; email GAL motion to opposing counsel, Ira.	0.60
05/13/2022	Email with Ryan Smithwick re estate issues.	0.40
05/17/2022	Call with Ryan Smithwick re estate issue.	0.10
05/18/2022	Email and call with opposing counsel re mots.	0.30
05/20/2022	Draft GAL order, extension motion; email with oc, Ryan Smithwick re status.	0.90
05/23/2022	Email opposing counsel re motions.	0.30
05/24/2022	Finalize and file motion; email GALs.	0.80
05/26/2022	Email with co-counsel re status.	0.20
05/27/2022	Email with co-counsel re timing; review orders; email GALs re order, calls.	0.70
06/01/2022	Call GALs.	0.40
06/03/2022	Email with GAL's re next steps; email with co-counsel re fees, status.	0.70
06/07/2022	Call with Brad Bannon re docs for settlement motion.	0.60
06/15/2022	Email Ryan Smithwick and Rick Parrotte re status.	0.10

06/17/2022	Call with co-counsel Ira re update, GALs, settlement issues; call with Paul Smith re same.	1.00
06/20/2022	Research paternity issue.	0.20
06/23/2022	Email with co-counsel re truck.	0.10
06/28/2022	Email with co-counsel re call; call with Ryan Smithwick re update; call with Tacker re structure.	0.70
06/29/2022	Zoom with Ira re settlement steps; email with Rick re structures and Tacker; confer with Paul Smith re steps for settlement motion.	1.20
07/08/2022	Email GALs re status.	0.20
07/11/2022	Email with Paul Smith re paternity; review email from Tacker.	0.20
07/12/2022	Review and research structure plans; email with Tacker re call; call Ryan Smithwick.	0.60
07/13/2022	Call with Tacker re trusts, structure options, next steps; call with Paul Smith re Tacker call, sett motion.	0.80
07/14/2022	Call with Brad Bannon re update; call with and email opposing counsel re update, structures.	0.50
07/15/2022	Email with Tacker re examples.	0.20
07/18/2022	Email with Ryan Smithwick re testing.	0.20
07/20/2022	Confer with Paul Smith re press inquiry; email Rick re meeting.	0.20
07/21/2022	Call with Brad Bannon re press, motion tasks; email Tacker re example.	0.40
07/25/2022	Email with Rick Parrotte re mtg; email Ryan Smithwick re meeting.	0.20
07/27/2022	Email with Ryan Smithwick re meeting.	0.10
07/28/2022	Email with co-counsel re update; email with Ryan Smithwick re meeting.	0.30
07/29/2022	Confer with Paul Smith re tasks for motion to approve; review docs from Tacker; email with Tacker re call.	0.60
08/01/2022	Call Ryan Smithwick re update; email Ira re status, motion.	0.80
08/02/2022	Review new structures; call with Tacker; email Ryan Smithwick re mtg; email opposing counsel re settlement docs; review financial plans.	1.10
08/03/2022	Conf call/mtg with Ryan Smithwick, TLC, Wanda, Whitney re money options; calls with TLC re trust.	2.40
08/04/2022	Email with team re mtg; call with Tacker; draft settlement agreement; email co-counsel re agreement.	1.60
08/05/2022	Email with counsel re conf call; email counsel re draft settlement; email Ryan Smithwick re update.	0.30
08/08/2022	Zoom with Tacker, GALs, Thompson re establishing trusts, amounts, structures, approval, next steps; confer with Paul Smith re update; email with Ira re settlement.	2.30
08/09/2022	Email with Paul Smith re Agan; Call with Paul Smith re same.	0.30
08/10/2022	Email Ryan Smithwick re update.	0.10
08/11/2022	Email with Ryan Smithwick re update; review Thompson agreement; conf with Paul Smith re fee aff.	0.60

08/12/2022	Email with Ryan Smithwick re mtg; call with Ira re update, motion to approve materials.	0.80
08/15/2022	Zoom with Ryan Smithwick, Whitney, Wanda, and Aldridge re trust, structure, settlement.	1.40
08/16/2022	Email with Thompson re fees, call; call with Tacker re trust, timelines, plans; email with Leto Copeley re trust attorney; call with Ryan re trust, estate questions; email opposing counsel re settlement draft.	2.20
08/17/2022	Email with Ryan re update; email and call opposing counsel re timeline; call Thompson re trust questions.	1.20
08/18/2022	Email Ryan re trust issues, client meeting; draft extension motion, email to co-counsel and opposing counsel; email with Tacker and GAL re possible structures; call with co-counsel re update, motion.	2.60
08/19/2022	Draft proposed order; call and email opposing counsel and his asst re motion; email with Ryan Smithwick re update; confer with Paul Smith re approval motion, next steps, extension motion.	1.40
08/22/2022	Call with Ryan Smithwick re update, filings, extension; call with Paul Smith re opposing counsel.	0.40
08/23/2022	Email with opposing counsel re extension; email co-counsel re update; email with Paul Smith re fee declarations.	0.50
08/24/2022	Email with Tacker re update.	0.20
08/26/2022	Research estate issue; email Tacker and Thompson re update; zoom meeting with Ryan and Bill Williams's family re structure and trust.	1.20
08/29/2022	Email with Tacker re settlement dates; email with opposing counsel re call.	0.40
08/30/2022	Email with Tacker and Rick re trust questions; call with Brad re update.	0.40
08/31/2022	Email and call with Ryan re estate issue, timeline, approval steps; email with Tacker re questions.	1.40
09/02/2022	Email with Tacker, Thompson re trust drafting, trustees; review draft declarations for motion.	0.50
09/06/2022	Review draft brief and declarations for approval motion, and call with Paul Smith re same; email with Tacker re trustee; call with Ira re declarations, update.	1.40
09/07/2022	Confer and email with Paul re attorney declarations, motion to approve, next steps, expense list.	0.50
09/08/2022	Email with opposing counsel re call; email with Ryan re hearing; email with Tacker, Matt re trustee; email with Rick re update; call with clients re settlement questions.	0.80
09/09/2022	Call with Thompson re trust drafting; email with Tacker re Kamea's plan; email with Mahoney re declaration; call and email with Ryan re Bill Williams Jr.	0.90
09/12/2022	Call with Tacker re structure, settlement documents; call and email opposing counsel re settlement.	0.40
09/13/2022	Email with opposing counsel re call; email with Tacker re trustee call; call with Paul re supporting declarations.	0.30

09/14/2022	Email with Ryan Smithwick re Bill Williams Jr.	0.10
09/15/2022	Email opposing counsel re call; review attorney declarations; call with trust attorney, trustee, structure advisor re trusts, structure, process; email with co-counsel re update, declaration.	1.70
09/16/2022	Call with opposing counsel re settlement language, motion, next steps; confer with Paul Smith re approval motion; email with Tacker, Ira re structures.	1.00
09/19/2022	Confer with Paul Smith re approval motion, settlement figures.	0.30
09/21/2022	Email with opposing counsel re settlement; draft attorney declaration; confer with Paul Smith re declarations.	2.10
09/22/2022	Email opposing counsel re edits; draft attorney declaration; email and calls with Tacker, GALs re final plans, update, declaration; revise approval motion; email with Thompson re update.	3.90
09/23/2022	Draft and revise approval motion; email with opposing counsel re settlement docs; draft and revise supporting declarations; email and call with Tacker re final plans.	6.10
09/25/2022	Email with Tacker, opposing counsel re assignments; email with Thompson re trusts.	0.30
09/26/2022	Email with GAL's, Tacker re final plans, motion; review and revise declarations, prop order; review and revise agreement docs; email with OC re same; draft attorney declaration; review trust docs; call with Thompson re same.	6.10
09/27/2022	Revise motion to approve, declarations, exhibits, trust motions; email with GAL's, co-counsel re motion, tasks; calls with opposing counsel. co-counsel re finalizing settlement.	6.60
09/28/2022	Draft and file extension motion; email and calls with co and opposing counsel re same; email with trust attorney re trust details.	1.60
09/29/2022	Draft motions to approve, seal; email with opposing counsel re filings; email GAL's re review docs; call with Tacker re docs, dates; confer with co-counsel re approval filing.	3.30
09/30/2022	Email opposing counsel re documents for motion; email with Tacker re same.	0.60
10/03/2022	Call with clients re update; email opposing counsel re settlement docs; email GAL's re trusts.	0.60
10/04/2022	Email with opposing counsel re status, open issues; email with GAL's re update, docs.	1.00
10/05/2022	Confer with Paul Smith re DPS issue; call opposing counsel again.	0.40
10/06/2022	Email GAL's, Tacker re update; email opposing counsel re motion, hearing request; call and email with co-counsel re same.	1.40
10/07/2022	Finalize and file motions for approval, trust creation, sealing and all accompanying documents.	7.20
10/10/2022	Email GAL's, Tacker, Thompson re update.	0.30
10/12/2022	Email with GAL's re collecting information, trustee.	0.20
10/14/2022	Call with Brad Bannon re press plan.	0.20
11/02/2022	Confer with Paul Smith re motion follow-up.	0.10

11/05/2022	Email with Ira Braswell re court's actions.	0.10
11/07/2022	Call clerk; email with Ira Braswell re status.	0.20
11/08/2022	Call with Tacker re court, structures; email GAL's, trustee re status; call with clerk re status.	0.50
11/09/2022	Review order.	0.10
11/15/2022	Review paternity pleadings; call with Smithwick re same.	0.40
11/16/2022	Confer with Paul Smith and Brad Bannon re paternity filing; call with clients re same; calls with Braswell re same.	2.10
11/17/2022	Calls with Braswell re paternity filing; call with Tacker re same; call with Smithwick re same.	1.90
11/18/2022	Call and confer with co-counsel re court notice; email opposing counsel re same; finalize notice.	0.90
11/21/2022	Call and email with Braswell re filing; file notice; confer with Brad Bannon and Paul Smith re paternity issue.	1.90
11/27/2022	Calls with Paul Smith and Brad Bannon re paternity hearing; email Ira Braswell re same.	0.70
11/28/2022	Confer with Paul Smith and call with Brad Bannon re paternity hearing; call with Rick Parrotte re same; call with Ryan Smithwick re same.	1.90
11/29/2022	Review paternity complaint.	0.20
11/30/2022	Email with trust attorney re update.	0.30
12/05/2022	Email with Ira Braswell re status; confer with Brad Bannon re clerk, paternity case.	0.40
12/06/2022	Review documents from Hilton; confer with co-counsel re same; email with Hilton re complaint.	1.30
12/07/2022	Calls with Ira Braswell re stay issue; confer with Paul Smith and Brad Bannon re same; draft notice to court.	1.40
12/08/2022	Calls with Paul Smith and Brad Bannon re stay motion; email with Brad Bannon re email with Hilton; call with Hilton re motion.	0.90
12/09/2022	Draft stay motion; call with Ira Braswell re same; call with Nichols re same; email with all counsel re motion.	1.30
12/12/2022	Finalize and file stay motion; call with Braswell re same.	0.60
12/13/2022	Email with Hilton re stay motion.	0.20
12/14/2022	Review order; email same to Hilton.	0.20
12/16/2022	Email Ira Braswell re paternity update.	0.10
12/22/2022	Email with co-counsel re paternity issue.	0.20
12/24/2022	Email Ira Braswell, GALs re update.	0.40
12/31/2022	Email Ira Braswell re report.	0.20
01/02/2023	Call with Brad Bannon re new settlement, next steps, client call; call with Ryan Smithwick re paternity issue, next steps.	1.60
01/03/2023	Call and email with Preston Hilton re revising settlement, next steps; confer with Paul Smith re same.	1.20
01/05/2023	Call with Tacker re new structures, trusts, GALs; confer with Paul re same; email Nichols re new settlement plan.	1.00

01/06/2023	Confer with Brad Bannon and Paul Smith re GAL issue; call with Ira Braswell re update; call with Preston Hilton re GAL appointment.	0.90
01/09/2023	Email with co-counsel re filings.	0.20
01/10/2023	Email with Ira Braswell re settlement funds; call with Preston Hilton re paternity issue; confer with Paul Smith re same.	1.00
01/11/2023	Email with Ira Braswell re amending settlement; finalize and file status report; email with Preston Hilton re paternity issue.	0.30
01/17/2023	Email with Tacker re new settlement; email with Ira Braswell re update; email with co-counsel re paternity issue.	0.50
01/20/2023	Email with Preston Hilton re paternity issue, GAL motion; email with GAL Parotte, Tacker re new settlement.	0.50
01/24/2023	Call with Preston Hilton re GAL motion; draft GAL motion; email Preston Hilton, opposing counsel re motion.	1.60
01/25/2023	Email Thompson, Preston Hilton re new structure, trust.	0.50
01/26/2023	Email with Preston Hilton re GAL motion; email with Tacker re structure; call and email with Nichols re motion; email GAL's, Braswell re settlement.	2.00
01/27/2023	Review emails re structures; email with Tacker re call.	0.20
01/30/2023	Email with opposing counsel re motion; email with Tacker, Preston Hilton re structure, trustee; finalize and file GAL motion.	1.00
02/03/2023	Draft revised settlement agreement; email with opposing counsel re same.	0.60
02/06/2023	Email Preston Hilton re trust questions.	0.10
02/07/2023	Call with Tacker re structures, trust; call with Matt Thompson re new trust; email with GALs re structures.	0.70
02/08/2023	Call and email with Tacker, Rick re structure; call with opposing counsel re new settlement.	0.50
02/09/2023	Review court orders, new structure documents; email with GAL's, Tacker re same; draft revised settlement docs.	2.10
02/10/2023	Review new structure plans, trust; call and email with Tacker, GAL re same.	1.30
02/13/2023	Email with Tacker re structures, settlement language; revise settlement documents; draft GAL declarations.	1.40
02/14/2023	Email Thompson and trustees re order; email with GALs re declarations.	0.90
02/15/2023	Email with GALs re declarations; revise declarations; email with opposing counsel re settlement motion, docs.	1.10
02/16/2023	Draft and revise settlement docs; send docs to opposing counsel; revise settlement, brief, declarations.	2.20
02/17/2023	Draft and revise motion brief and proposed order; call with Tacker re order.	2.10
02/18/2023	Email co-counsel, GAL's re next steps, final settlement.	0.90
02/20/2023	Email co-counsel, GAL's re proposed order; call with client re update; email with Thompson re order.	1.10

02/21/2023	Revise proposed order; email to opposing counsel; email with Thompson re trusts; draft ZL trust motion.	1.30
	Total:	284.8